



Anne M. Collart

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
Direct: 973-596-4737 Fax: 973-639-8389
acollart@gibbonslaw.com

January 8, 2023

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Federal Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: In re Extradition of Steven Lee, Mag No. 23-9089

Dear Judge Waldor:

As the Court is aware, this Firm represents Respondent Steven Lee in the above-captioned matter, which is currently pending before Your Honor. We write with regard to Mr. Lee's conditions of release, and specifically to request, on consent, that his current conditions, as modified several months ago to remove the requirement that he wear an ankle monitor, be continued for an additional three months until April 10, 2024. Mr. Lee is still recovering from major open-heart surgery and has limited ability to walk for more than ten minutes at a time, drastically diminishing the risk that he will flee; as well, that surgery means that wearing the monitor will be very uncomfortable for him, and is, as set forth below, contraindicated by his physicians.

By way of brief reminder, in March 2023, Mr. Lee was arrested and released on bail subject to certain conditions, including a \$10,000,000 bond, co-signed by his son, Jonathan Lee, and secured by the residence of his brother, Jason Lee. As the Court may also recall, Mr. Lee suffered a heart attack in mid-October and underwent emergency open-heart quadruple bypass surgery. His GPS ankle monitor had to be removed so that doctors could harvest veins from one or more of his legs in order to utilize them in the course of operating on his heart, and his medical team requested that the ankle bracelet not be reapplied during the course of his cardiac rehabilitation, which was anticipated to continue until at least January 10, 2024.

On December 20, 2023, Mr. Lee attended a follow up appointment with his cardiologist, Dr. Matthew Katz. At the conclusion of that appointment, the undersigned counsel spoke with Dr. Katz to confirm Mr. Lee's current condition and inquire about his continuing medical needs. Dr. Katz advised that Mr. Lee's sternum has almost completely healed, but that he is still progressing in his recovery from what was a very serious surgery, which caused significant deconditioning and will require continued cardiac rehabilitation. He is presently able to walk for only ten minutes at a time before he becomes exhausted. Mr. Lee also faces a continued and life-long risk of swelling in the leg from which veins were harvested because he has a reduced ability to drain blood from that leg. Dr. Katz advised to avoid placing anything that can constrict blood flow on the leg and

GIBBONS P.C.

January 8, 2023

Page 2

stated that anything that will impede Mr. Lee's ability to exercise or be mobile will be a detriment to his health and to his recovery from this major open heart surgery. Dr. Katz confirmed these details via letter dated December 27, 2023, attached hereto as **Exhibit A**. He has further advised that Mr. Lee has completed only 14 of 36 cardiac rehabilitation sessions to date. *Id.*

In light of Mr. Lee's ongoing recovery and his continuing need to increase his mobility and stamina following surgery, he most respectfully requests that the conditions of his release be modified to remove the requirement that he be subject to GPS monitoring by way of an ankle bracelet through April 10, 2024. We have consulted with Mr. Lee's Pretrial Services Officer, Stephen Griggs, and Assistant U.S. Attorney Carolyn Silane, both of whom have very graciously consented to this request. If the foregoing meets with Your Honor's approval, we have provided a proposed consent order for the convenience of the Court. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. We thank the Court for its very kind consideration of this request.

Respectfully submitted,

s/ Anne M. Collart

Anne M. Collart, Esq.

s/ Lawrence S. Lustberg

Lawrence S. Lustberg, Esq.

Exhibit A

Letter by Matthew Katz, MD on 12/27/2023



Atlantic Health System

Associates in Cardiovascular Disease
211 Mountain Avenue, Suite 300
SPRINGFIELD NJ 07081
Tel: 973-467-0005
Fax: 973-912-8989

December 27, 2023

Patient: **Steven Lee**
Date of Birth: **1/31/1969**
Date of Visit: **12/27/2023**

To Whom It May Concern:

Mr. Lee is currently under my care for coronary artery disease. In October of this year he underwent coronary artery bypass surgery which requires extensive recovery, and although his sternum has healed at this point he still has significant deconditioning which requires continued cardiac rehab. As of the date of this letter Mr. Lee has completed 14 of 36 cardiac rehab sessions, and is presently able to walk for approximately 10 minutes before he becomes exhausted. Due to venous harvesting in his left leg for his bypass surgery Mr. Lee has a lifelong risk of swelling in his left leg due to decreased drainage of blood from that extremity, therefore we recommend avoiding placement anything that can constrict venous return in his left leg. Lastly it is of my opinion that anything impeding Mr. Lee's ability to exercise or participate in his cardiac rehab regiment will be an added detriment to his health and recovery from major open heart surgery.

If you have any questions or concerns, please don't hesitate to call.

Sincerely,

Matthew Katz, MD

CC: No Recipients